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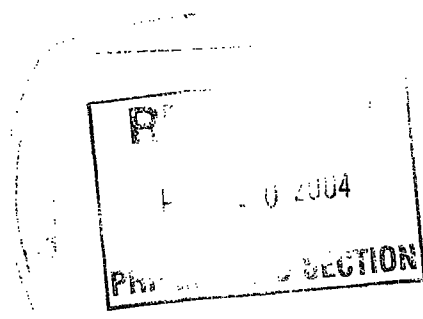
Solutia Inc.

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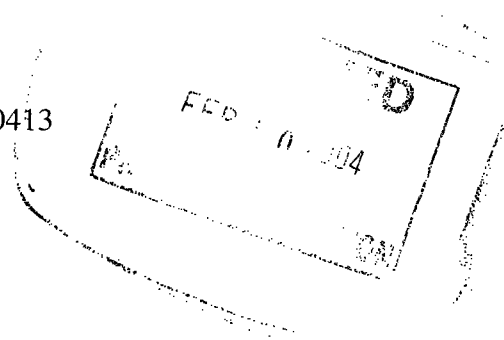
St. Louis, Missouri 63166-6760

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February 4, 2004

VIA CERTIFIED MAIL NO. 7001 1940 0001 0386 0413
RETURN RECEIPT REQUESTED



Ms. Carlyn Winter Prisk (3HS11)
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, PA 19103


Re: Follow-up 104(e) Request – Solutia Inc.
Lower Darby Creek Area Superfund Site
Delaware and Philadelphia Counties, Pennsylvania

Dear Ms. Winter Prisk:

Solutia Inc. ("Solutia") received the follow-up Section 104(e) Request for Information regarding the above-referenced site on December 8, 2003. Pursuant to the request of my Legal Assistant, Sharon Williams, you granted Solutia an extension to respond on or before February 9, 2004, as documented by Ms. Williams' January 5, 2004 letter.

In response to the EPA's information request, we disagree with EPA's overly broad assumption of authority, which it asserts is conferred by the Comprehensive Environmental Response, Compensation & Liability Act ("CERCLA"), 42 U.S.C. § 9601 et seq., and other laws. Solutia also objects to the overly broad scope of the question and definitions included within EPA's information request, and to the unreasonable time period it covers, going back more than forty (40) years.

As indicated in our August 8, 2001 response to the initial information request, Solutia was responding as a result of its indemnity obligation to Pharmacia Corporation



("Pharmacia," now a wholly-owned subsidiary of Pfizer). I want to explain more about the relationship between the companies in light of Solutia's recent (December 17, 2003) filing for protection during reorganization under chapter 11 of the federal bankruptcy law.

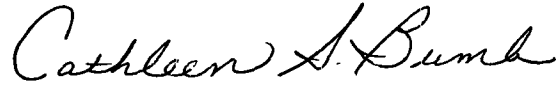
Monsanto Company ("Monsanto") began operations in 1901 in St. Louis. During the 1900's, Monsanto grew from a local saccharin producer to a leading international company, manufacturing agricultural products, pharmaceuticals, food ingredients and chemicals. Beginning in the early 1990's, Monsanto shifted its focus away from the traditional chemicals business to its life science business. On April 1, 1997, Monsanto incorporated Solutia as a wholly-owned subsidiary. On September 1, 1997, Monsanto spun off Solutia by distributing its stock to existing Monsanto shareholders, and Solutia became an independent publicly-held company listed on the New York Stock Exchange. Pursuant to an agreement effecting the spin (the "Distribution Agreement"), Monsanto transferred certain assets and liabilities of its chemicals businesses to Solutia. Solutia was required under that agreement to indemnify Monsanto for certain liabilities of the Monsanto Company, including pre-spin liabilities associated with the chemicals business.

Subsequently, Monsanto went through additional corporate changes. On December 19, 1999, Monsanto entered into a merger agreement with Pharmacia & Upjohn, Inc. On February 9, 2000, Monsanto incorporated "Monsanto Ag Company" as a wholly-owned subsidiary of Pharmacia & Upjohn. On March 31, 2000, the Monsanto and Pharmacia & Upjohn merger became effective, whereby Pharmacia & Upjohn became a wholly-owned subsidiary of Monsanto and Monsanto changed its name from "Monsanto Company" to "Pharmacia Corporation," and "Monsanto Ag Company" changed its name to "Monsanto Company" (referred to hereinafter as "New Monsanto"). On September 1, 2000, Pharmacia transferred the operations, assets and liabilities of the agricultural business to New Monsanto. On October 23, 2000, New Monsanto completed an initial public offering in which it sold approximately 15% of the shares of its common stock to the public. Pharmacia continued to own 220 million shares of New Monsanto's common stock until August 13, 2002, when Pharmacia distributed its 220 million shares to its shareowners via a tax-free stock dividend. As a result, Pharmacia no longer owned any equity interest in New Monsanto. Finally, on April 16, 2003, pursuant to a merger transaction with Pfizer, Inc. ("Pfizer"), Pharmacia became a wholly-owned subsidiary of Pfizer. Consequently, Pharmacia, New Monsanto, and Solutia, while sharing a history, are completely independent companies.

Because Solutia did not come into existence until 1997, Solutia could not have disposed of any waste during the time period the information request covers. However, consistent with Solutia's policy of cooperation with government agencies, we are fully responding to EPA's request to the extent Solutia has information regarding the past waste practices of Monsanto (now "Pharmacia"), while at the same time reserving all objections and defenses to EPA's statement of authority or the scope of information requested. Solutia's investigation for this response includes reviewing and interviewing former Monsanto employees.

If you should have any further questions regarding this matter, please contact me directly at the telephone number shown above.

Sincerely,

A handwritten signature in cursive script that reads "Cathleen S. Bumb". The signature is written in black ink and is positioned above the printed name and title.

Cathleen S. Bumb
Assistant General Counsel Environmental

Enclosure

cc: Mary M. Shaffer – Monsanto Company
Carol A. Casazza – Pfizer Corporation

**Solutia Inc.'s Response to EPA's Follow-up 104(e) Request for
Information Regarding Lower Darby Creek Area/Folcroft Landfill**

Solutia generally objects to the overly broad and unduly burdensome nature of the questions included in the December 8, 2003 information request propounded by the EPA. Solutia also objects to the instructions and definitions included in the request as exceeding the scope of EPA's authority for an information request, and further objects to EPA's unauthorized propounding of this request and its demand for response. Finally, Solutia objects on the basis that EPA's information request contains undefined or improperly-defined terms, rendering the questions vague and ambiguous, overly broad and unduly burdensome. These objections are continuing in nature, and apply to each and every response made to EPA's information request. Notwithstanding these objections, and without waiving same, Solutia voluntarily provides the responses as set forth below.

This request was directed to Solutia Inc. As explained in the cover letter, Solutia came into being effective September 1, 1997, when Pharmacia (formerly Monsanto Company) spun-off its non-agricultural chemical businesses into an independent company. Solutia did not exist at the time the landfills making up the Lower Darby Creek Area Superfund Site - namely Clearview Landfill, Folcroft Landfill, and Folcroft Landfill Annex located in Delaware and Philadelphia Counties, Pennsylvania - operated, and therefore the questions below that ask for information about Solutia's activities regarding this site can all be answered by stating that Solutia had no involvement with this site. However, in the spirit of cooperation and to move matters forward, we will answer the questions to the extent that Solutia has knowledge of and/or access to the old files, employees and operations of Pharmacia. To our knowledge, Solutia is unaware of any files for Monsanto's former New Jersey plant sites beyond those that Solutia obtained at the time of its spin-off from Monsanto.

In accordance with the EPA's use of the term "site" in its requests, the Clearview Landfill, Folcroft Landfill, and Folcroft Landfill Annex as portions of the Lower Darby Creek Area Superfund Site are hereinafter collectively referred to as the "Site".

Opening Statement

On May 28 and July 1, 1987, Monsanto (now known as Pharmacia) responded to a Section 104(e) Information Request from the EPA regarding the Tinicum Marsh/Folcroft Landfill, Folcroft, Pennsylvania. On August 30 and October 1, 2001, Solutia, on behalf of Pharmacia, once again undertook a comprehensive, good faith search for information regarding Monsanto's potential connection to the Site at issue. Pursuant to the December 8, 2003, request, Solutia has conducted another diligent inquiry, investigating the testimony given to EPA that alleges Monsanto transported waste (mostly cardboard boxes) from its New Jersey Plants to the Folcroft Landfill in Monsanto's own box trucks and semi-trucks.

Solutia's investigation of this allegation involved contacting former employees that worked at Monsanto's former New Jersey plants (all of which were closed - and all but one sold - prior to the spin-off of Solutia) and whose area of responsibility would have included the knowledge of disposal and treatment of waste materials. Without exception, all of the retirees that were

contacted advised us that Monsanto did not own or operate any box trucks or semi-trucks for transporting either waste or products, although each of the plants had pick-up trucks that were used for plant maintenance. Additionally, the employees identified that the Delaware River plant owned one tank truck, but it operated only on the plant premises. This tank truck was used to transport benzyl chloride that was manufactured at the Delaware River plant to the Santicizer @160 process within the plant. All the benzyl chloride manufactured at the plant was consumed internally and the truck was nickel lined to prevent any type of chemical reaction.

Former employees contacted by Solutia are as follows:

Nick T. Macchiarolo
Delaware River Process Engineer Superintendent

[REDACTED]

Billy G. McGuire
Delaware River Technical Services Superintendent

[REDACTED]

Elton I. Wade
Delaware River Purchasing Agent

[REDACTED]

Emory H. Kimball
Delaware River Production Manager

[REDACTED]

Donald C. Hoegel
Delaware River Superintendent Technical Services & Distribution

[REDACTED]

John M. Van Gelder
Delaware River Manufacturing Superintendent

[REDACTED]

David C. Dieterich
Camden Plant Manager

[REDACTED]

George E. Kupchinsky
Kearny Plant Manager
[REDACTED]

James C. Rademaker
Kenilworth Plant Manager
[REDACTED]

Thomas A. Nebel
Yardville Superintendent Plant Engineer and Maintenance
[REDACTED]

Should the United States desire to contact any of these individuals or other current or former employees, Solutia requests that such contact be arranged through our in-house counsel, Cathleen S. Bumb.

In addition to the above telephone interviews, the Monsanto files stored by Solutia were reviewed and no additional documents were discovered responsive to this request.

INFORMATION REQUEST RESPONSES TO SPECIFIC QUESTIONS

1. **In regard to the disposal of waste by Monsanto at the Folcroft Landfill using Monsanto's own box trucks, please identify:**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

- a. **The dates or time periods during which such material was removed or transported for disposal;**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

- b. **The nature of such material, including the chemical content, characteristics and physical state (i.e. liquid, solid, or gas);**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

- c. **The annual quantity, (number of loads, gallons, drums etc.) of such materials;**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

- d. **The manner in which such material was contained or transported for shipment or disposal;**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

- e. **The location to which such material was transported for disposal (Folcroft Landfill or Folcroft Landfill Annex);**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

- f. **The persons who selected the location to which such material was transported for disposal;**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

- g. **The individuals employed by Monsanto, including truck drivers, dispatchers, managers, etc. who removed or transported such material; and,**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

- h. **Any billing information and documents (invoices, trip tickets, manifests, hauling contracts, etc.) in Solutia's possession regarding arrangement made to remove or transport such material.**

RESPONSE: Solutia has discovered no documents or other information indicating that Monsanto disposed of waste at the Site or that Monsanto owned or operated any semi-trucks or box trucks.

2. **Solutia's October 1, 2001 response identifies documents regarding waste generated at Monsanto's Delaware River facility in Bridgewater, NJ. Specifically, one document identifies waste from the Santosol 100 process going to a landfill. In addition, Monsanto's documents state that inert ash from the incineration of process treatment**

units was sent off-site by a commercial hauler. For each such waste stream, answer each of the sub-parts in Question 1, above, and indicate the company or individual which transported the waste stream for disposal.

RESPONSE: The document that Solutia provided in its October 1, 2001 Response to the EPA was entitled "Zero Discharge At The Delaware River Plant – March 1976". This report documented a study, whose purpose was to determine if zero discharge from this manufacturing location was technically and economically feasible. This study determined that technology either did not exist to achieve zero pollution or such technology was not economically feasible. The plant did not implement either the Proposed In-Department or Alternate Treatment processes described in this report for any of the waste streams. Accordingly, the reference to the Santosol® 100 process waste going to a landfill was a proposed Alternate Treatment and was not implemented. Furthermore, the plant did not have an on-site incinerator in existence prior to this report (such incinerator is listed as "Proposed") nor was one installed after this report was prepared. Accordingly, no off-site disposal of inert ash from the plant would have occurred.